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MAR 01 2019  
4           AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
5           BY           DEPUTY  
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Magistrate Judge Mary Alice Theiler

7           UNITED STATES DISTRICT COURT FOR THE  
8           WESTERN DISTRICT OF WASHINGTON  
9           AT SEATTLE

10          UNITED STATES OF AMERICA,

11           Plaintiff,

13           v.

15          JEROME RAY WILSON,

16           Defendant.

NO. CR18-131RAJ

MOTION FOR DETENTION

18          The United States moves for pretrial detention of the Defendant, pursuant to 18  
19 U.S.C. 3142(e) and (f)

20          1.     **Eligibility of Case.** This case is eligible for a detention order because this  
21 case involves (check all that apply):

- 22         Crime of violence (18 U.S.C. 3156).  
23         Crime of Terrorism (18 U.S.C. 2332b (g)(5)(B)) with a maximum sentence  
24           of ten years or more.  
25         Crime with a maximum sentence of life imprisonment or death.  
26         Drug offense with a maximum sentence of ten years or more.

- 1       Felony offense and defendant has two prior convictions in the four  
2      categories above, or two State convictions that would otherwise fall within  
3      these four categories if federal jurisdiction had existed.
  
- 4       Felony offense involving a minor victim other than a crime of violence.
  
- 5       Felony offense, other than a crime of violence, involving possession or use  
6      of a firearm, destructive device (as those terms are defined in 18 U.S.C.  
7      921), or any other dangerous weapon.
  
- 8       Felony offense other than a crime of violence that involves a failure to  
9      register as a Sex Offender (18 U.S.C. 2250).
  
- 10      Serious risk the defendant will flee.
  
- 11      Serious risk of obstruction of justice, including intimidation of a  
12      prospective witness or juror.

13     2. **Reason for Detention.** The Court should detain defendant because there  
14      are no conditions of release which will reasonably assure (check one or both):

- 15      Defendant's appearance as required.
  
- 16      Safety of any other person and the community.

17     3. **Rebuttable Presumption.** The United States will invoke the rebuttable  
18      presumption against defendant under 3142(e). The presumption applies because:

- 19      Probable cause to believe defendant committed offense within five years of  
20      release following conviction for a qualifying offense committed while on  
21      pretrial release.
  
- 22      Probable cause to believe defendant committed drug offense with a  
23      maximum sentence of ten years or more.
  
- 24      Probable cause to believe defendant committed a violation of one of the  
25      following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or  
26      kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).

- 1       Probable cause to believe defendant committed an offense involving a  
2      victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1),  
3      2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through  
4      2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

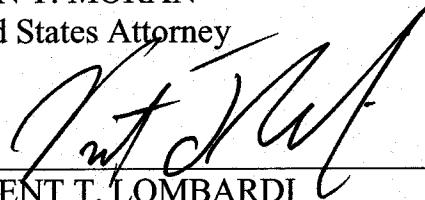
4      **4. Time for Detention Hearing.** The United States requests the Court  
5      conduct the detention hearing:

- 6       At the initial appearance  
7       After a continuance of \_\_\_\_ days (not more than 3)

9      DATED this 1<sup>st</sup> day of March, 2019.

11     Respectfully submitted,

13     BRIAN T. MORAN  
14     United States Attorney

15       
16     VINCENT T. LOMBARDI  
17     Assistant United States Attorney